

Jo Ann Goddard
Director
Federal Regulatory Relations

1275 Pennsylvania Avenue, N.W., Suite 400
Washington, D.C. 20004
(202) 383-6429

PACIFIC  TELESIS
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September 14, 1994

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William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: CC Docket No. 92-77, *Billed Party Preference*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "Reply Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of

Billed Party Preference
for 0+ InterLATA Calls

CC Docket No. 92-77

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REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pacific Bell and Nevada Bell file these reply comments relating to Billed Party Preference. Numerous parties filed comments in this proceeding, to provide input on the Commission's cost-benefit analysis and to air their views on the necessity and desirability of the billed party preference system.

I. **BPP IS NECESSARY TO STRENGTHEN AND EVEN THE OPERATOR SERVICES MARKETPLACE**

In contrast with the position of many parties that consumers are comfortable with dialing access codes, the real truth is that consumers are not comfortable dialing these codes and choose to do so due to their fear of being gouged.

Many parties have shown that access code dialing is increasing.¹ AT&T, for example, posits that the reason for this increase is because consumers

¹ For example, LDDS, pp. 8-9; Intellicall, pp. 13-14; ACTA, p. 3.

are satisfied with access code dialing, and customer choice has been satisfied.²

But, AT&T's argument is belied by its own advertising. "Your local company has told you that your calling card works at any phone, anywhere, anytime. But read between the lines and you'll find what they're not telling you. You could be charged 2 to 3 times AT&T rates."³ Consumers are not comfortable with access codes; their fear of being gouged forces them to use access codes. Fear is not the sign of a healthy marketplace.

Access code dialing is not the customer's choice. As AT&T (and others) said recently:

"experience... has shown that consumers view dialing extra digits as a deterrent to the use of another carrier. In other words, consumers view 10XXX access as a different, lower quality service than seven digit dialing 1+ or ten digit dialing service"⁴

Last month AT&T asked the California PUC to impose intraLATA BPP, or what it terms 0+ intraLATA equal access. And yet, at the federal level AT&T's stance is that access codes adequately allow customers to reach their preferred carrier.⁵

Obviously when the market would allow AT&T to increase its customer base, (as in the intraLATA market) it supports the concept of dialing parity, but when dialing

² AT&T, pp. 8-9.

³ See Exhibit A attached.

⁴ Joint Motion for Order Establishing Requirements and Schedule for Implementation of IntraLATA Equal Access, filed by MCI, AT&T Communications of California, and California Association of Long Distance Telephone Companies, before the California Public Utilities Commission on July 18, 1994, in l. 87-11-033, p.10 [emphasis added].

⁵ AT&T's Comments. p. 9.

parity would decrease its market share (as in this proceeding), it staunchly opposes it.

II. THE MECHANICS FOR COST RECOVERY MUST BE DETERMINED AND COST RECOVERY MUST BE ASSURED

Cost recovery continues to be a central issue for LECs that will be spending hundreds of millions of dollars to implement BPP.⁶ Sprint agrees with Pacific and others that an equal access recovery-type charge assessed on all carriers, as part of their access charges is an appropriate way to recover the implementation costs of BPP.⁷ By spreading the costs in this manner, LECs can recover the costs over a shorter period (we suggest a 3 year period). If recovery is spread over a longer period of time (such as 10 years), cost recovery does not begin to truly compensate the LEC for the initial outlay of the dollars. Further, by bifurcating the recovery into a flat-rated charge on carrier for implementation costs, and a query-based charge for the recurring costs, it allows costs to be recovered in a way that echoes the timing of the expenditure. Implementation costs will be incurred by the LEC before BPP is in use. Recurring charges are incurred each year, and could be recovered in a query based charge as operator assisted calls are made.

The Commission must commit not only to the concept of cost recovery, but also to the specifics. The types of costs that must be allowed to be recovered include end office upgrades to recognize and route a BPP call, upgrades

⁶ See, e.g., Ameritech, p. 8; USTA, p. 10.

⁷ Sprint, p. 42.

to the end office switch, operator service switch, and LIDB to perform BPP requirements, the increased trunking to accommodate BPP calls, increased AABS capacity, increased number of operators and operator service centers, provisioning system upgrades, costs associated with the unique requirements of the inmate market, costs of balloting, and any other additional costs ordered by the Commission for implementation of BPP (such as 14 digit screening). We would also like to emphasize as we have stated before⁸ the inmate market has unique, critical initiatives that must be addressed, such as the prevention of witness harassment, and the necessity for adequate inmate facility compensation. Because of this, we believe that for inmate telephone services, the concept of total cost recovery for all these initiatives is prerequisite to implementation of BPP. The Commission should specifically endorse all these types of costs as appropriate categories for inclusion in the tariffing process.

The Commission should allow each company to determine the best course for implementing BPP in its network. While GTE may be able to deploy BPP without OSS7, by using available technology and OLNS, others such as Pacific may not. Our switch types do not today provide the split routing necessary for BPP implementation. But, we may be able to design a different solution based on the particulars of our network. The mandate from the Commission and the associated cost recovery should not require a particular technology be deployed. Rather, each company should be allowed flexibility in how it deploys the service, and what levels of cost can be recovered. If a company deploys a more expensive technology than

⁸ See Comments of Pacific Bell and Nevada Bell, filed August 1, 1994.

was necessary in order to satisfy some network architectures, then the tariffing process can be used to exclude the "extra" cost. But if a company can prove the necessity of its BPP design, then cost recovery in full should be allowed. Of course, despite differences in deployment within any company, network interoperability must be assured so that a nationwide standard is met.

III. A REEXAMINATION OF THE ARCHITECTURE SHOULD BE ACCOMPLISHED

This proceeding has been pending over 5 years. Those 5 years have been years in which unprecedented change has affected the telecommunications industry. The last 18 months have seen changes of incredible proportions as the emergence of the information superhighway has encouraged massive commitments of capital, alliances between diverse industries and a fundamental change in the way the "telephone company" is viewed. Those changes have not left Pacific Telesis unaffected. We have committed to spend \$16 billion to upgrade our network in various ways. We are rewiring our network with a hybrid fiber/coaxial mix in order to gain operational efficiencies and to permit provisioning of various multi-media services; we are pursuing a "video dial tone" offering; we have committed to a \$1 billion upgrade to our switches so that by the end of 1997 we will have an all digital network; we are actively pursuing our "Education First" initiative in which we will offer to public schools, public libraries and community colleges video and data applications on the communications superhighway; and we have indicated our intention to be an active participant in the upcoming auctions for Personal

Communications Services. These initiative illustrate the important commitment this company has to improving California. But, these initiatives cost money. And, that is what we need to examine in the course of deciding how Billed Party Preference should be deployed.

We have never wavered in our support of BPP. BPP will allow customers to have the carrier of their choice handle their 0+ calls. While various parties took issue with the benefits of BPP, none can seriously argue that customer choice is bad. Indeed, as AT&T and others are currently arguing in California, customer choice forms the basis for equal access. And equal access for operator assisted calls is billed party preference. BPP is in the best interest of the public and the marketplace. If the costs to implement BPP weren't so high, fewer parties would seriously debate the matter.

But we acknowledge that the costs are high -- at least the costs as we can estimate them. As the Commission knows, the software necessary to deploy BPP (including OSS7) has not yet been developed and the costs cannot be accurately estimated. Since Ameritech first suggested a BPP like service in 1987, the industry has been grappling with that fact, and trying to refine the numbers in order to satisfy Commission questions. Yet, LECs are still as uncertain now as we were 2½ years ago when we first began to look at the costs of implementing the design sketched out by the Commission in the Notice of Proposed Rulemaking.

When Bell Atlantic filed its petition for rulemaking in 1989, it suggested the architecture that could be used to perform a carrier identification function. It suggested that all 0+ calls be routed to the LEC operator service switch for carrier

identification through LIDB.⁹ Since that time, the industry has been refining that basic design, and as stated above, struggling with the costs. The last 5 years have seen fundamental changes in the telephone network. New technologies have been deployed, and many new technologies are being developed. The network, in fact, is very different now than it was in 1989. The Signaling System 7 architecture is generally in place, intelligent nodes are being built in the network, and advanced databases act to route calls. Yet the industry and the Commission have clung to the architecture for BPP that was designed 5 years ago, despite the fact that the implementation period for BPP is expected to be 3 years from the date of mandate.¹⁰ We are therefore relying on an 8 year old architecture.

We suggest that a new design may be needed. Certainly a reexamination is in order. The examination can be two fold. First, the architecture for BPP must be compatible with the long term requirements of the network. Deploying an outdated technology, or an architecture that is not supportive of the future direction of the network is not in anyone's best interests. Second, the architecture should be reviewed to minimize the costs that are such a big stumbling block in the current design. We believe the Commission should direct the industry to examine all possible alternatives and come up with recommendations. Unfortunately, while the Commission has sought alternative designs in its Further Notice of Proposed Rulemaking, parties are so polarized over the concept (in part

⁹ Bell Atlantic Petition for Rulemaking, filed April 13, 1989, p. 4.

¹⁰ We agree that the implementation period should be 3 years, not 2½ years as we stated earlier. See Further Notice of Proposed Rulemaking, para. 83.

because of the costs they drive), that no collective thought on alternatives has happened.

We suggest that the Commission direct the industry, particularly the LECs, to meet and come up with alternate ways that carrier identification can be accomplished. The industry group should be empowered to not only address technical issues, such as the architecture, but also cost and feasibility options so that the alternatives can be accurately reviewed. While we do not know if such direction will positively come up with a lower cost alternative, we believe that it is worth the time. The Commission should mandate BPP, then put implementation on hold for 6 months, and direct that such meetings occur. Since this proceeding has been pending for 5 years, we do not believe that 6 months will substantially prejudice the outcome.


This may seem like a change of position for us, in that we have continually supported BPP and have repeatedly cited the necessity for BPP. But it is not a change of position. We simply have difficulty, at this time, to commit to spending substantial capital dollars at a time when so much else is pending, especially if those capital dollars could be decreased by some alteration in design. However, the Commission should understand that if it believes it needs to make a decision without allowing this reexamination of the design, we continue to support BPP, as long as full cost recovery is allowed. (see above). And, whether or not the Commission directs the industry to reexamine the design, we will continue to examine how we can best deploy BPP in our network to minimize costs.

IV. CONCLUSION

The Commission should mandate BPP, commit to a specific cost recovery mechanism, and direct the industry to reexamine the BPP design in light of new developments in technology. As consumers use more dial around options, those left will continue to pay higher rates that allow the associated service provider to maintain its level of commission payments. The BPP mandate should not include 14-digit screening since, as we have stated, provisioning it will only drive higher costs.

Respectfully submitted,

PACIFIC BELL
NEVADA BELL



JAMES P. TUTTHILL
NANCY C. WOOLF

140 New Montgomery St., Rm. 1523
San Francisco, California 94105
(415) 542-7657

JAMES L. WURTZ

1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 383-6472

Their Attorneys

Date: September 14, 1994

Your local phone company

Be careful between the times and

has told you that your

you'll find what they are not telling you

calling card works at any

You could be charged 10-15 times more rates

phone, anywhere, anytime.

Avoid calling card overcharges. Dial 10+ATT+0.

Recently, your local phone company may have told you that you can dial 0 + the area code and number for *all* long distance calling card calls. But there's a side to the story they're not telling you.

When you dial 0 + the area code and number at some phones, you could be charged more than the rates you normally pay with AT&T! In fact, a customer recently paid \$7.10 for a call that would have cost only \$1.50 with AT&T. That's because not all phones automatically connect you to AT&T. Some connect you to one of over 400 phone companies you've never heard of—with rates that are also unheard of.

When calling from a non-AT&T phone, dial
10 + ATT + 0 (10 + 238 + 0) + area code + number
or dial 1 800 661 0661 to reach the AT&T Network

When calling from an AT&T phone, dial
10 + ATT + 0 (10 + 238 + 0) + area code + number
or dial 1 800 661 0661 to reach the AT&T Network

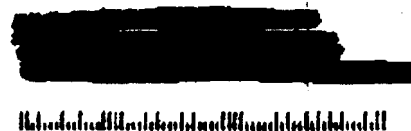
Here's how to avoid paying too much. If AT&T is the long distance carrier, dial as you normally would. If AT&T isn't the carrier, or you don't hear "AT&T" after the tone, hang up and follow the simple instructions on these stickers. Peel one off and place it in a convenient spot. If you have questions or would like more stickers, please call us at 1 800 661-0661, ext. 5534.

For international calls, hang up and dial 10+ATT+01 before the country code, city code, and number. Price difference is based on the charges of alternate operator services companies. Stickers are for personal use only. Picture do not apply to public phones.



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EXHIBIT A

CERTIFICATE OF SERVICE

I, Alex Kositsky, do hereby certify that a copy of the foregoing Reply Comments of Pacific Bell and Nevada Bell was mailed on this 14th day of September, 1994, via first class United States mail, postage prepaid to the parties on the attached service list.

A handwritten signature in black ink, appearing to read "Alex Kositsky", written over a horizontal line.

Alex Kositsky

SERVICE LIST
CC DOCKET 92-77

Robert P. Bigelow
22 Grove Place #30
Winchester, Mass. 01890

Michael W. Scott, CEO
CMS
731 Walker Rd, Ste H-2
Great Falls, Va. 22066

Danny Griener
Claremont University Center
330 E. 8th Street
Claremont, CA. 91711

Thomas G. Frame, Warden
Chester County Prison
501 S. Wawaset Rd
West Chester PA 19382

Donald L. Fredenburg
Kern County Sheriff
Minimum Security Facility
17635 Industrial Farm Rd.
Bakersfield, CA 93308

Mendocino County Sheriff
Sheriff's Correctional Facility
951 Low Gap Rd
Ukiah, CA 95482

Tim Schuetzle, Warden
North Dakota State Penitentiary
P. O. Box 5521
Bismark, ND 58502

Merry Gay McMackin
American Jail Association
2053 Day Road, Ste. 100
Hagerstown, PA 21740

Vincent A.. Guarini
Warden
Lancaster County Prison
625 E. King St.
Lancaster, PA 17602

Eric E. Pfeffer
Howard Johnson Franchise Systems
339 Jefferson Rd.
Parsippany, NJ 07054

Leslie Johnson
Sandra Schilling
Larimer County Detention Ctr.
2405 Midpoint Drive
Fort Collins, Colorado 80525

George A. Vose, Jr.
Director
R. I. Dept. of Corrections
40 Howard Avenue
Cranston, RI 02920

Roger C. DuCharme
Telematic Corporation
6675 South Kenton Street
Englewood, Colorado 80111

Carl R. Harbaugh, Sheriff
Frederick County Sheriff's Ofc.
Courthouse
100 W. Patrick Street
Frederick, MD 21701

Robert N. Weller
Super 8 Motels, Inc.
339 Jefferson Rd.
Parsippany, NJ 07054

Robert J. Beni
The Circle K Corporation
P.O. Box 52085
Phoenix, AZ 85072

John Russell, President
Days Inn
339 Jefferson Rd.
Parsippany, NJ 07054

Charles M. Barclay
American Assn. of Airport Executives
4212 King Street
Alexandra, VA 22302

Donald G. Raider
Park Inn International
339 Jefferson Rd.
Parsippany, NJ 07054

Patricia R. Tappan
Commissioner
Department Of Correction
Onondaga County
P.O.Box 143
Jamesville, NY 13078

Anthony W. Pellican
Director of Corrections
Monmouth County Dept of Corrections
1 Waterworks Road
Freehold, NJ 07728

Edward J. Camp, Sheriff
Adams County Sheriff's Dept.
1901 West Bridge Street
Brighton, Colorado 80601

Owen's Public Phone & Fax
P.O. Box 60474
Sacramento, CA 95860

James R. Drach
Captain/Jail Administrator
Berrien County Sheriff Department
919 Port Street
St. Joseph, Michigan 49085

William C. Duncil, Warden
Huttonsville Correctional Center
P. O. Box One
Huttonsville, W. Va. 26273

Ronald A. Belz, Vice President
Peabody Hotel Group
5118 Park Avenue, Suite 245
Memphis, Tennessee 38117

Troy W. Stover
Jeffco Airport
11755 Airport Way
Terminal Building
Broomfield, Colorado 80021

Keith J. McLean
Detention Administrator
County of Georgetown
Detention Center
505 North Marriman Rd.
Georgetown, So, Carolina 29440

Don Haas
Oklahoma Sheriffs; Association
P. O. Box 1094
Norman, Oklahoma 73030

Albert Mednicoff
Nevade Payphone Association
4620 Arville, Suite H
Las Vegas, Nevada 69103

Emily Regnier
Airport Properties Department
Oakand International Airport
P. O. Box 2064
Oakland, California 94604

James Myers
Detention/Courts Detention Facility
Wahoe County Sheriff's Office
911 Parr Blvd.
Reno, NV 89512

Trudi R. Renwick, Ph.D.
Public Policy Analyst
Public Utility Law Project of New York
Pieter Schuyler Financial Center
39 Columbia Street
Albany, New York 12207

Colleen M. Dale
Deputy General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

Lawrence C. Lesza
Director of Corrections
Lake County Sheriff's Department
20 South County Street
Waukegan, Illinois 60085

James P. Drury
John L. Kammerzell
County Sheriffs of Colorado
11160 North Huron
Suite 31
Northglenn, CO 80234

James A. Thelen
Director, Operations Supports Svcs.
The Cleveland Clinic Foundation
9500 Euclid Avenue
Cleveland, Ohio 41195

Howard Porter
Adams State College
Alamosa, Colorado 81102

Thomas M. Rice
Prairie Correctional Facility
P. O. Box 147
Appleton, MN 56028

Dennis Kornwolf
County Executive
730 Wisconsin Avenue
Racine, WI 53403

Marlan Tevis
Asst. Director of Corrections
777 E. Fabyan Parkway
Batavia, Illinois 60510

John Wheat
Executive Deputy Director
Salt Lake City Airport Authority
AMF Box 22084
Salt Lake City, Utah 84122

James P. Elwood
Director of Aviation
City of Pueblo
31201 Brian Circle
Pueblo, Colorado 81001

Bob Francisco
Director of Student Life
Colorado School of Mines
1600 Maple Street
Golden, CO 80401

Robert N. Broadbent
Director of Aviation
McCarran International Airport
Postal Box 1105
Las Vegas, Nevada 89111

Jerry T. Beddow
Cherokee Communications
PO Box 549
Jacksonville, Texas 75766

Carl L. Remmel
Assistant Director of Aviation
Aspen/Pitkin County Airport
0233 East Airport Road
Aspen, Colorado 81611

John M. Bisinger
Sr. Vice President
AHA TelePLAN
515 North State Street
Suite 2850
Chicago, Illinois 60612

James H. Gomez
Director of Corrections
State of California
Department of Corrections
P. O. Box 942883
Sacramento, California 94283

Anthony Marquez
First Assistant Attorney General
Colorado Public Utilities Commission
1580 Logan Street
Office Level 2
Denver, Colorado 80203

Gaines P. Sturdivant
President
MMI Hotel Group
P.O. Box 16807
Jackson, Mississippi 39236

Jancice M. Doherty
Public Payphones, Inc.
119 Scully Drive
Schaumburg, Illinois 60193

Joseph G. McAtee
Marion County Sheriff
40 South Alabama Street
Indianapolis, Indiana 46204

Harry K. Singletary, Jr.
Secretary
Florida Department of Corrections
2601 Blair Stone Road
Tallahassee, Florida 32399

David R. Rodrigues
Deputy Warden of Operations
County of Erie
Department of Corrections
139 West 5th Street
Erie, PA 16507

W. Scott Deaver
Vice President Marketing
Ramada Franchise Systems, Inc
339 Jefferson Rd.
Parsippany, NJ 07054

James E. Lewis
P. O. Box 689
Ely, Nevada 89301

Kellie Phillips
Director of Operator Services
CallAmerica Business Communications
4251 South Higura
San Luis Obispo, CA 93401

Kenosha County
Board of Supervisors
912 65th Street
Kenosha, Wisconsin 53140

Glenn B. Manishin
Blumenfeld & Cohen
Sumner Square
1615 M Street, N. W. Suite 700
Washington, DC. 20036

Jean L. Kiddoo
Dana Frix
Swidler & Berlin, Chtd.
OPUS Correctional Inc. D/B/A Loctel
3000 K Street, N.W. Suite 300
Washington, D.C. 20007

Kenneth F. Melley, Jr.
Director of Regulatory Affairs
U.S. Long Distance, Inc.
9311 San Pedro, Suite 300
San Antonio, Texas 78216

Barney C. Parrella
Senior Vice President
Airports Assn. Council International - NA
1775 K Street, N.W. Suite 500
Washington, D.C. 20006

Mary McDermott
Vice President & General Counsel
United States Telephone Association
1401 H Street, N.W. Suite 600
Washington, D.C. 20005

Judith St. Ledger-Roty
John W. Hunter
Reed Smith Shaw & McClay
Intellicall Companies
1200 18th Street, N.W.
Washington, D.C. 20036

Paul Rodgers
Charles D. Gray
James Bradford Ramsay
National Assn. of Regulatory Utility Cmsn.
1102 ICC Building
Post Office Box 684
Washington, D.C. 20044

Kirk Smith
President
Operator Service Company
1624 Tenth Street
Lubbock, TX 79401

Douglas E. Neel
Vice President, Regulatory Affairs
MessagePhone, Inc.
5910 N. Central Expressway, Suite 1575
Dallas, Texas 75206

Jean L. Kiddoo
Ann P. Morton
Swidler & Berlin Chartered
Cleartel Comm. Inc. & Call America
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Albert H. Kramer
David B. Jeppsen
Attorneys for the Inmate Calling Svcs
Providers Task Force
Keck, Mahin & Cate
1201 New York Avenue, N.W.
Washington, D.C. 20005-3919

Kathy L. Shobert
Director, Federal Regulatory Affairs
General Communication, Inc.
901 15th Street, N.W., Suite 900
Washington, D.C. 20005

John T. Lenahan
Frank M. Panek
Larry A. Peck
Attorneys for Ameritech
Ameritech Operating Companies
2000 W. Ameritech Center Drive
Room 4H86
Hoffman Estates, IL 60196-1025

William D. Baskett III
John K. Rose
Attorneys for Cincinnati Bell Tel Co.
Frost & Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202

Anne U. MacClintock
Vice President - Regulatory Affairs &
Public Policy
The Southern New England Tel. Co.
227 Church Street
New Haven, CT 06510

Robert M. Lynch
Richard C. Hartgrove
J. Paul Walters, Jr.
Attorneys for Southwestern Bell Tel. Co.
One Bell Center, Room 3520
St. Louis, Missouri 63101

Garry E. Lucas, Sheriff of Clark County
The Clark County Law Enforcement Ctr.
707 West 13th Street
P. O. Box 410
Vancouver, Washington, 98666

Martin W. Bercovici
Attorney for
Waterway Communications System, Inc.
Keller and Heckman
1001 G Street, N. W. Suite 500 West
Washington, D.C. 20001

Harold Brown
President
South Carolina Jail Administrators
Association
P. O. Box 4046
Anderson, S.C. 29622

H.R. Trantham
ADM Asst.
Lacy Rogers, Sheriff
San Jacinto County
P. O. Box 7
Coldspring, Texas 77331

Perry R. Eichor
Director
Department of Community Services
20 McGee Street
Greenville, S.C. 29601

Brian Redmond
President
South Carolina Jail Association
1400 Huger Street
Columbia, S.C. 29201

Dwight W. Greenlee
Director of Airport Administration
Wichita Mid-Continent Airport
2173 Air Cargo Road, P.O. Box 9130
Wichita, Kansas 67277-0130

Parker Evatt
South Carolina Department of
Corrections
P.O. Box 21787/4444
Broad River Road
Columbia, South Carolina 29221

Brad E. Mutschelknaus
Ann M. Plaza
Wiley, Rein & Fielding
Ameritel Pay Phones, Inc.
1776 K Street, N.W.
Washington, D.C. 20006

Edward R. Wholl
William J. Balcerski
New York Telephone Company and
New England Telephone and
Telegraph Company
120 Bloomingdale Road
White Plains, NY 10605

John M. Goodman
Attorney for the Bell Atlantic Telephone
Companies
1710 H Street, N.W.
Washington, D.C. 20006

Douglas F. Brent
Associate Counsel
LDDS Communications, Inc.
9300 Shelbyville Road, Suite 700
Louisville, Kentucky 40222

Catherine R. Sloan
Vice-President, Federal Affairs
LDDS Communications, Inc.
1825 I Street, N.W. Suite 400
Washington, D.C. 20006

Mary J. Sisak
Donal J. Elardo
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.w.
Washington, D.C. 20006

Mark C. Rosenlum
Robert J. McKee
Richard H. Rubin
AT&T Corp.
295 North Maple Avenue, Room 3254A2
Basking Ridge, New Jersey 07920

Gail L. Polivy
GTE Service Corporation on behalf of
GTE's domestic telephone companies
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

James U. Troup
Arter & Hadden
IOWA Network Services, Inc.
1801 K Street, N. W.
Suite 400K
Washington, D.C. 20006

Daniel J. Rooks
Daniel J. & Elaine Rooks
4250 Blackland Drive
Marietta, Georgia 30067

Glen B. Manishin
Neil S. Ende
Attorney for Gateway Technologies, Inc.
Blumenfeld & Cohen
1615 M Street, N.W., Suite 700
Washington, D.C. 20036

Paul C. Besozzi
Besozzi, Gavin & Craven
Polar Communications Corp. and
Digital Technologies, Inc.
1901 L Street, N.W., Suite 200
Washington, D.C. 20036

Mitchell F. Brecher
Donelan, Cleary, Wood & Maser, P.C.
1275 K Street, N.W.
Suite 850
Washington, D.C. 20005-4078

Paul J. Berman
Alane C. Weixel
Covington & Burling
Anchorage Telephone Utility
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044-7566

Randolph J. May
Brian T. Ashby
Sutherland, Asbill & Brennan
National Tele-Sav, Inc.
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2404

Eugene F. Mullin
Christopher A. Holt
Mullin, Rhyne, Emmons and Topel,
P.C. Citizens United For Rehabilitation
of Errants
1225 Connecticut Avenue, N.W.
Suite 300
Washington, D.C. 20036-2604

Cheryl A. Tritt
Morrison & Foerster
Citizens United For Rehabilitation of
Errants
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006

Bob Schoonmaker
Vice President
GVNW Inc./Management
P.O. Box 25969
Colorado Springs, CO 80936

Charles H. Helein
General Counsel
Helein & Waysdorf, P.C.
America's Carriers Telecommunications
Association
1850 M Street, N. W. Suite 550
Washington, D.C. 20036

William M. Barvick
Attorney for Midwest Independent
Coin Payphone Association
240 East High Street, # 202
Jefferson City, Missouri 65101

W. James Falkenstein
Jail Administrator
John S. Reder, Sheriff
301 West Main Street,
Midland, Michigan 48640

Janie Myers
President & CEO
9920 S. La Clenega Blvd.
Suite 507
Inglewood, CA 90301

Lynne DeLano
Department of Corrections
Office of the Secretary
115 East Dakota Avenue
Pierre, SD 57501-3216

James A. McCaulley
Director
Richard County Detention Center
1400 Huger Street
Columbia, South Carolina 29201

Ron Angelone
Commonwealth of Virginia
Department of Corrections
P.O. Box 26963
Richmond, Virginia 23261

Donald G. Raider
Park Inn International
339 Jefferson Road
Parsippany, New Jersey 07054

James E. Lewis
P.O. Box 689
Ely, NV 89301

Tom Sawyer
Sheriff-Coroner
Merced County Sheriff's Department
2222 M Street
Merced, California 95340

Randolph J. May
Brian T. Ashby
Sutherland, Asbill & Brennan
Capital Network System, Inc.
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2404

Edward C. Addison
Director
Division of Communications
Virginia State Corporation Commission
P.O. Box 1197
Richmond, Virginia 23209

Marlon Tevis
Asst. Director
Kane County Adult Corrections
777 E. Fabyan Prkwy
Batavia, Illinois 60510-1499

Ron Webb
Sheriff
Independence County Sheriff's Dept.
P.O. Box 4236
Batestrille, Arkansas 72503

Sheriff David W. Troutman
County of Summit
53 University Avenue
Akron, Ohio 44308

Allan G. Tolman, Chief
Telephone and Network Services
Department of General Services
Telecommunications Division
601 Sequoia Pacific Boulevard
Sacramento, CA 95814-0282

Charles W. Gates
Director of Aviation
City of Austin
Department of Aviation
3600 Manor Road
Austin, Texas 78723

John Grubb, Sheriff
Sheriff's Office of Smgth County
111 West North Lane,
Marion, Virginia 24354

Donal J. Charlevoix, Sheriff
County of Dickinson
P.O. Box 609
Iron Mountain, Michigan 49801

Jamil Saba, Sheriff
Dougherty County Sheriff's Office
225 Pine Avenue
Albany, Georgia 31702

Terry Poff
Sheriff Beckham County
Sayre, Oklahoma 73662

Charles "Bud" Meeks
Executive Director
National Sheriff's Association
1450 Duke Street
Alexandria, Virginia 22314-3490

M. Robert Sutherland
Richard M. Sbarratta
Helen A. Shockey
BellSouth Telecommunications, Inc.
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

Margaret Vonheeder, Director
Division of Management and Budget
Department of Corrections
P.O. Box 11110
Olympia, Washington, 98504-1110

Don Hass
President
Oklahoma Sheriff's Association
P.O. Box 1094
Norman, Oklahoma 73070

Daniel B. Calvert, Sheriff
Josephine County
500 N.W. 6th/Courthouse
Grants Pass, Oregon 97526

Anthony w. Pellicane
Director of Corrections
Monmouth County Department of
Corrections
1 Waterworks Road
Freehold, New Jersey 07728

Fred A. Spruill, Sheriff
Chowan County, North Carolina
P.O. Box 78
Edenton, North Carolina 27932

Kari D. Myers
Director, Business & Property Mgmt
Seattle-Tacoma International Airport
P.O. Box 68727
Seattle, WA 98168

Larry A. Fields, Director
Oklahoma Department of Corrections
3400 N. Martin Luther King Avenue
Oklahoma City, Oklahoma 73136

Glenn B. Manishin
Neil S. Ende
Blumenfeld & Cohen
Attorneys for Gateway Technologies, Inc.
1615 M Street, N.W., Suite 700
Washington, D.C. 20036

Brad E. Mutschelknaus
Ann M. Plaza
Wiley, Rein & Fielding
Attorneys for AmeriTel Pay Phones, Inc.
1776 K Street, N.W.
Washington, D.C. 20006

Robert F. Aldrich
Keck, Mahin & Cate
Attorneys for the American Public
Communications Council
1201 New York Ave., N.W.
Penthouse Suite
Washington, D.C. 20005

Buford L. Cribb
10400 Rancho Road
P.O. Box 5005
Adelanto, CA 92301-724

Bill Aleshire
County Judge, Travis County
Travis County Administration Building
P.O. Box 1748 Room 520
Austin, Texas 78767

Lieutenant Nancy Underhill
Jail Administrator
Baker County Detention Center
56 N. 2nd Street
MacClenny, Fl. 32063

Cindy Z. Schonhaut, Esq.
MFS Communications Company, Inc.
3000 K Street, N.W. Suite 300
Washington, D.C. 20007

Eugene f. Mullin
Christopher A. Holt
Mullin, Rhyne, Emmons and Topel,
P.C. Citizens United for Rehabilitation
of Errants
1225 Connecticut Avenue, N.W.
Suite 300
Washington, D.C. 20036-2604

Cheryl A. Tritt
Morrison & Foerster
Citizens United for Rehabilitation of
Errants
2000 Pennsylvania Avenue, N.W.
Suite 5500
Washington, D.C. 20006